

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Creation of a Low Power)	RM-11287
Radio Service – on the)	
AM Broadcast Band)	
)	

To the Commission:

Comments of Nickolaus E. Leggett, N3NL
Amateur Radio Operator

I am one of the petitioners in this docket (RM-11287). In addition, I am one of the original petitioners for the establishment of the Low Power FM (LPFM) radio broadcasting service (RM-9208 July 7, 1997 subsequently included in MM Docket 99-25). I am also a certified electronics technician (ISCET and NARTE) and an Extra Class amateur radio operator (call sign N3NL). I have a Master of Arts degree in Political Science from the Johns Hopkins University.

My comments describe specific reasons why the Commission should proceed to establish a Low Power AM (LPAM) radio broadcasting service.

Community Building in Underprivileged Neighborhoods

There are many underprivileged neighborhoods which would benefit from the establishment of a local low-power AM broadcast station. These neighborhoods have many people who are isolated from the Nation and the opportunities that it offers. Local civic and church groups could set up low-

power AM broadcasting stations to reach out to these people and include them in a growing community.

The local LPAM broadcasting station would allow youth and citizens at large to get on the air with their own music, poetry, theatre, commentary, and political observations. This would show people that there is more to life than the crime and hopelessness so common in the ghettos and barrios. The station could support day-to-day notifications by the community watch, neighborhood associations, and from the local governments.

The community would be able to listen to their LPAM station with the inexpensive pocket radios that they already have. Similarly the LPAM station would use simple amplitude modulation technology which should be inexpensive and affordable.

Diverse Political Commentary and American Legitimacy

LPAM offers the opportunity for a more diverse political discourse than that offered by the mainstream broadcasters. The mainstream media serve up political material ranging from the center to the right wing. But what about left-wing political ideas? These are missing from much of the big media. LPAM could restore a broad range of political discussion similar to that in present-day Europe or America of the past.

In addition, LPAM would support political discussions of very local issues such as cattle prices, off-road vehicle access to a near-by national park, hunting seasons, neighborhood crime rates, and the school board election.

In the long run, if political commentary is restricted to just broadcasting elites, the basic legitimacy of America will decline with unpleasant political and social consequences.

Training of New Talent for Broadcasting

LPAM is an ideal environment for recruiting and training new talent for broadcasting. LPAM is appealing because it is real broadcasting to a real audience with content that makes a difference. LPAM is accessible so that young people (and seniors) from the neighborhood can create program content and get it on the air. Many of the participants in LPAM will continue with an interest in getting further into the broadcast industry and making their mark.

Many of these people will develop their own innovative program content that will help broadcasting as a whole to advance beyond its current rather static content.

In addition to training programming and broadcasting talent, LPAM will train technical talent for broadcasting. People will grow in their knowledge of broadcasting technology and develop a thirst for more such knowledge. Many of these people will be from an amateur radio background.

Emergency Coordination

As hurricane Katrina has shown us all, local coordination and communication during an emergency is very important. Many full-power broadcast stations ran into trouble during Katrina. The LPAM stations use

simple low-power technology that can be easily operated during an emergency from available sources of electricity such as car batteries, lantern batteries, portable generators, solar cell arrays, or even hand-cranked generators. When the LPAM stations' antennas are blown away, simple wire antennas can be put up very quickly to replace them. If necessary, LPAM broadcast stations can be carried to higher ground or to an intact building to continue operation.

In the future, there will be more Katrinas such as an intense earthquake in California, a pandemic, or terrorist attacks in major cities. LPAM can provide continuous local service to coordinate the specific community responses to such events.

Integration with the Schools

LPAM stations can be operated by local middle schools, high schools, and colleges. These LPAM stations would provide students with an opportunity to learn and grow by developing content for their own real radio station and taking the responsibility of operating their station. This service would be similar to the Class D (low-power) educational FM stations that were once common on college campuses.

Students around the Nation could take command of their own radio stations to broadcast school sports, school plays and concerts, local government meetings, model car races, and the radio emissions from Jupiter obtained by the school's Project Radio JOVE radio telescope.

Returning Classical Music to the Air

Some of the National Public Radio (NPR) stations have decided to drop most of their classical music programming. LPAM can step into this gap and provide classical music programming. While AM is not as good fidelity as FM, it is still a lot better than no classical music at all. These stations could also include specific instruction in classical music appreciation using commentary illuminating specific pieces of music.

Foreign Language Programming

LPAM can provide programming in various foreign languages. This would serve local language groups that are too small for conventional broadcasting. This type of service would be very useful in multicultural

areas. A single LPAM broadcast station could serve several language groups at different times of the day. A show providing text content for the blind transmitted by audio tone Morse Code could also be offered.

Part 15 Broadcasting

At the present time, there are several hundred broadcasters who operate on the AM band within the Commission's Part 15 regulations. These are very very low power stations that still manage to reach a listening area.

The Commission should encourage these stations to continue operating and providing their very unique voices to local communities. In many ways, Part 15 operations are "Citizen Broadcasters" who set up to serve specific neighborhoods and communities.

Any LPAM broadcasting service should include some accommodation for continued operation by Part 15 broadcasters.

If the Commission decides it cannot establish LPAM broadcasting, it should consider enhancing Part 15 broadcasting with a higher power limit. Some LPAM-type services could be provided, at least in some geographic areas, by an enhanced Part 15 service.

Little Guy Advertising

The local hobby shop, laundromat, or used book shop cannot afford any advertising at all on the full-power radio broadcasting stations. These small businesses would certainly be able to afford LPAM advertising rates. This would allow local businesses to connect with their community. It would give locally-owned businesses a better chance to compete with the big chain stores.

In considering the subject of advertising and commercial broadcasting, the Commission should seriously consider the Constitutionality of spectrum auctions. Such auctions have an enormous economic class bias which is probably unconstitutional.

Respectfully submitted,

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